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7 CLARK COUNTY SCHOOL DISTRICT

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 ELENA RODRIGUEZ-MALFAVON,  
12 Plaintiff,  
13 vs.  
14 CLARK COUNTY SCHOOL DISTRICT,  
15 Defendant.

CASE NO. 2:12-CV-01673-APG-PAL

**STIPULATION AND ORDER TO  
EXCLUDE CERTAIN EVIDENCE AT  
TRIAL**

17 Plaintiff ELENA RODRIGUEZ-MALFAVON (“Plaintiff”) and Defendant CLARK  
18 COUNTY SCHOOL DISTRICT (“Defendant”), by and through their respective counsel of record,  
19 hereby stipulate and agree to exclude certain evidence at trial pursuant to Local Rule 16-3.

20 Local Rule 16-3 now requires the parties to participate in the meet-and-confer process prior  
21 to filing motions in limine before the Court. **LR 16-3**. The parties recently engaged in meet-and-  
22 confer efforts regarding four specific issues Defendant proposed should be excluded from trial.  
23 Having reached an agreement on those issues, the parties hereby stipulate to exclude the following  
24 evidence from the upcoming trial which is limited to Plaintiff’s Title VII retaliation claim:

- 25 1. Any evidence or references to other past instances of alleged discrimination or retaliation of  
other CCSD employees by Bramby Tollen, Edward Goldman, or any other CCSD employee.
- 26 2. Any evidence or references to the circumstances surrounding why Bramby Tollen’s  
employment with CCSD ended in 2014.

1       3. Any evidence or references to alleged medical damages or injuries Plaintiff claims to have  
2                          suffered as a result of the alleged Title VII retaliation.  
3       4. Any evidence or references to indirect financial damages Plaintiff claims to have suffered  
4                          because of her demotion in 2011, including but not limited to the need for Plaintiff to  
5                          refinance her cars or home.

6                          The parties file the instant stipulation to memorialize these agreements and ask that the Court  
7                          herby Order that evidence or references to these issues be excluded from trial in this matter.

8                          Dated: August 19, 2016

                                Dated: August 19, 2016

9                          Respectfully submitted,

                                Respectfully submitted,

11                          /s/ Richard Segerblom  
12                          RICHARD SEGERBLOM, ESQ.

13                          Attorney for Plaintiff  
14                          ELENA RODRIGUEZ-MALFAVON

11                          /s/ Ethan D. Thomas  
12                          BRUCE C. YOUNG, ESQ.  
13                          ETHAN D. THOMAS, ESQ.  
14                          LITTLER MENDELSON, P.C.

15                          Attorneys for Defendant  
16                          CLARK COUNTY SCHOOL DISTRICT

17                          **ORDER**

18                          **IT IS SO ORDERED.**



19                          UNITED STATES DISTRICT JUDGE  
20                          Dated: August 22, 2016.